

Evan J. Spelfogel (474440)
Epstein Becker & Green, P.C.
250 Park Avenue
New York, New York 10177-1211
(212) 351-4500
Attorneys for Defendant
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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LUANN P. GOULD,	:
	:
Plaintiff,	: 05 CV 11118 (PBS)
	:
– against –	:
	:
LUCENT TECHNOLOGIES, INC.,	:
	:
Defendant.	:
	:
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MOTION FOR LEAVE TO APPEAR *PRO HAC VICE*

Defendant Lucent Technologies, Inc., by and through its attorneys of record, Evan Spelfogel, Epstein Becker & Green, P.C., hereby moves pursuant to Local Rule 83.5.3(b) for an Order admitting Robyn Ruderman and Deborah Markowitz *pro hac vice* for the purpose of appearing and practicing in the above-captioned matter. In support of its Motion, Defendant states as follows:

1. Undersigned counsel of record for Defendant in this matter is a member in good standing of the bar of this Court.

2. Ms. Ruderman and Ms. Markowitz are associates at the law firm of Epstein Becker & Green, P.C., 250 Park Avenue, New York, NY 10177-1211, (212) 351-4833.

3. Ms. Ruderman and Ms. Markowitz are members in good standing of the Bar of the State of New York, as well as the United States District Court for the Southern and Eastern Districts of New York.

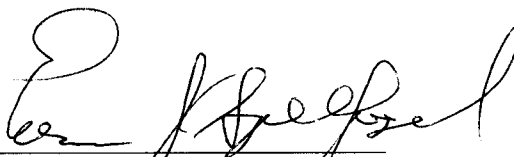
4. There are no disciplinary proceedings pending against Ms. Ruderman and Ms. Markowitz.

5. Ms. Ruderman and Ms. Markowitz possess knowledge of relevant issues that will be invaluable in connection with the representation of the Defendant in this matter.

6. Ms. Ruderman and Ms. Markowitz are familiar with the Local Rules of the United States District Court for the District of Massachusetts and agree to abide by the rules and procedures applicable to attorneys practicing in the District Court of Massachusetts in connection with this litigation.

7. Attached hereto as Exhibit A are the Declarations of Robyn Ruderman and Deborah Markowitz, affirming the statements made in this Motion.

WHEREFORE, Defendant respectfully requests that the Court grant leave for Robyn Ruderman and Deborah Markowitz to appear and practice *pro hac vice* in the above captioned matter.


Evan J. Spelfogel (474440)

EPSTEIN BECKER & GREEN, P.C.
250 Park Avenue
New York, New York 10177-1211
(212) 351-4500
Attorneys for Defendant Lucent Technologies Inc.

Dated: September 12, 2005

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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LUANN P. GOULD,	:
	:
Plaintiff,	: 05 CV 11118 (PBS)
	:
– against –	: DECLARATION OF ROBYN
	: RUDERMAN IN SUPPORT OF
LUCENT TECHNOLOGIES, INC.,	: MOTION FOR LEAVE TO ADMIT
	: <u>PRO HAC VICE</u>
Defendant.	:
	:
----- X	

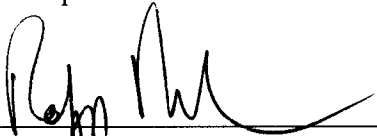
ROBYN RUDERMAN declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney of the law firm Epstein Becker & Green, P.C., attorneys for defendant Lucent Technologies, Inc. (“Lucent”). I make this declaration in support of my petition to be admitted *pro hac vice* as counsel to Lucent, in the above-captioned matter.
2. I am domiciled in the State of New York and I practice law in New York State.
3. I am admitted to practice law in the State Courts of New York and the United States District Courts for the Southern and Eastern Districts of New York. I am a member in good standing of all the aforementioned Bars.
4. There are no disciplinary proceedings pending against me as a member of the Bar of any jurisdiction, and I have never been held in contempt of court, censured, suspended or disbarred.
5. The New York Bar grants like *pro hac vice* privileges to members of the bar of the Commonwealth of Massachusetts.

6. I have become familiar with the standards of professional conduct imposed upon members of the Massachusetts Bar and relevant statutes, rules and procedures and will abide by them.

7. I seek to participate in the above-captioned matter because of my expertise in the applicable area.

WHEREFORE, I respectfully request that that this Court grant leave for me to appear and practice *pro hac vice* for all purposes in the above-captioned matter.



ROBYN RUDERMAN

Dated: New York, New York
September 12, 2005

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

----- X
LUANN P. GOULD, :
 :
 Plaintiff, : 05 CV 11118 (PBS)
 :
 -- against -- : **DECLARATION OF DEBORAH**
 : **MARKOWITZ IN SUPPORT OF**
 LUCENT TECHNOLOGIES, INC., : **MOTION FOR LEAVE TO ADMIT**
 : **PRO HAC VICE**
 Defendant. :
 :
 :
----- X

DEBORAH MARKOWITZ declares, under penalty of perjury and pursuant to
28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney of the law firm Epstein Becker & Green, P.C., attorneys
for defendant Lucent Technologies, Inc. ("Lucent"). I make this declaration in support of my
petition to be admitted *pro hac vice* as counsel to Lucent, in the above-captioned matter.

2. I am domiciled in the State of New York and I practice law in New York
State.

3. I am admitted to practice law in the State Courts of New York and the United
States District Courts for the Southern and Eastern Districts of New York. I am a member in
good standing of all the aforementioned Bars.

4. There are no disciplinary proceedings pending against me as a member of the
Bar of any jurisdiction, and I have never been held in contempt of court, censured, suspended or
disbarred.

5. The New York Bar grants like *pro hac vice* privileges to members of the bar
of the Commonwealth of Massachusetts.

6. I have become familiar with the standards of professional conduct imposed upon members of the Massachusetts Bar and relevant statutes, rules and procedures and will abide by them.

7. I seek to participate in the above-captioned matter because of my expertise in the applicable area.

WHEREFORE, I respectfully request that that this Court grant leave for me to appear and practice *pro hac vice* for all purposes in the above-captioned matter.


DEBORAH MARKOWITZ

Dated: New York, New York
September 12, 2005

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

----- X	
LUANN P. GOULD,	: (PBS)
	: :
Plaintiff,	: 05 CV 11118 (PBS)
	: :
– against –	: :
	: ORDER FOR <i>PRO HAC VICE</i>
LUCENT TECHNOLOGIES, INC.,	: ADMISSION OF
	: ROBYN RUDERMAN
Defendant.	: <u>DEBORAH MARKOWITZ</u>
	: :
----- X	

Upon motion before this Court, pursuant to 83.5.3(b) of the Local Rules Governing the Admission and Practice of Attorneys, the admission *pro hac vice* of Robyn Ruderman and Deborah Markowitz, in the captioned matter is hereby

ORDERED that said Motion is GRANTED.

HONORABLE PATTI B. SARIS
U.S. DISTRICT JUDGE

Dated: New York, New York
September 12, 2005